

Bryan Pease (SB# 239139)  
1901 First Ave., Suite 219  
San Diego, CA 92101  
Ph. (619) 723-0369  
Fax (619) 923-1001

Attorney for Plaintiff  
SUSAN SHALOV

UNITED STATES DISTRICT COURT

FOR THE SOUTHERN DISTRICT OF CALIFORNIA, SAN DIEGO DIVISION

SUSAN SHALOV,

Plaintiff,

v.

MARK LANE; CAPITOL MOTION  
PICTURES, LLC; FULLY ATTIRED FILM  
GROUP, LP; FULL CIRCLE  
PRODUCTIONS, LP,

Defendants.

CASE NO. 10CV0474H AJB

**PLAINTIFF SUSAN SHALOV'S FEDERAL  
RULE OF CIVIL PROCEDURE 26(a)(3)  
PRETRIAL DISCLOSURES**

Plaintff Susan Shalov hereby makes the following pretrial disclosures pursuant to Rule 26(a)(3) of the Federal Rules of Civil Procedure.

**I. PRELIMINARY STATEMENT**

The designation of witnesses and identification of exhibits should not be deemed to be an admission as to any fact in dispute or a waiver of any rights or objections that Plaintiff might assert. Plaintiff does not waive any privilege, protection or objection concerning her disclosures that may be asserted and permitted by law at trial or in any subsequent proceedings.

**II. DESIGNATION OF WITNESSES**

A. Witnesses Expected to be Presented at Trial:

1. Mark Lane (address and phone number previously provided)

2. John Muhich (address and phone number previously provided)
3. Andrew Muhich (address and phone number previously provided)
4. Alex Arguiano (address and phone number previously provided)
5. Carl Steen (address and phone number previously provided)
6. Allan Hubbard (to be contacted through Defendants' counsel)
7. Dana Harrloe (to be contacted through Defendants' counsel)
8. Susan Shalov (address and phone number previously provided)
9. John Washeck (to be contacted through Defendants' counsel)
10. Alex Anguiano (to be contacted through Defendants' counsel)
11. Carl Stein (to be contacted through Defendants' counsel)
12. Meir Bitton (to be contacted through Defendants' counsel)
13. Areti McCarthy (First Regional Bank)

### III. IDENTIFICATION OF EXHIBITS

Ex. No.	Description	Objection	Date submitted	Dated admitted
1.	Copies of all Plaintiff's checks cashed by defendants			
2.	Copy of \$6,000 check cashed by defendant but never accounted for on any K1's			
3.	Coverletter showing deposits for seven units in "Outlaw Bride"			
4.	Sept. 28, 2004 letter stating that Full Circle changed its name to Fully Attired Film Group LLC			
5.	Copies of letters showing Fully Attired Film Group LLC as the company that owns and produced the movie "Checking Out."			
6.	Copies of advertising for the movie "Checking Out" showing it as being presented by Fully Attired Film Group LLC (now called Capitol Motion Pictures LLC) and not by Fully Attired Film Group LP			
7.	Copies of the distributor contract dated			

	Feb. 9, 2006 showing Mark Lane signing as the representative for FULLY ATTIRED FILM GROUP LLC (now called Capitol Motion Pictures LLC) and not signing as a representative of Fully Attired Film Group LP.			
8.	Recordings of Mark Lane speaking			
9.	Letters faxed from Mark Lane to Susan Shalov			
10.	Copies of the accredited investor packet that Susan Shalov signed in 2004			
11.	Copies of the accredited investor packet that Susan Shalov did not sign			
12.	Copy of the accredited investor packet that Mark Lane sent to Susan Shalov in 2009			
13.	Copy of Mark Lane's handwritten note to Susan Shalov instructing her to backdate her signature on the accredited investor packet, which she did not do.			
14.	Certificate for a \$45,000 investment in Capitol Motion Pictures LLC, aka Fully Attired Film Group LLC, sent to Susan Shalov in 2009.			

18  
19 GROUND FOR OBJECTION

- 20 1. No Objection; Admissibility Stipulated      6. Insufficient Foundation  
 21 2. Irrelevant      7. Unduly time Consuming, Prejudicial, Confusing, or Misleading  
 22 3. Hearsay      8. Subsequent Repair  
 23 4. Best Evidence      9. Other (Specify)  
 24 5. Inadmissible Opinion

25  
26  
27  
28 Dated: August 29, 2011

By: /s/ Bryan W. Pease  
 Bryan W. Pease

**PROOF OF SERVICE BY ELECTRONIC FILING**

I am employed in the County of San Diego, State of California. I am over the age of 18 and not a party to the within action; my business address is: 1901 First Ave., Suite 219, San Diego, CA 92101.

On August 29, 2011, I served the foregoing documents described as:

**PLAINTIFF SUSAN SHALOV'S FEDERAL RULE OF CIVIL PROCEDURE  
26(a)(3) PRETRIAL DISCLOSURES**

on the interested parties in this action by electronic service:

John H. Stephens

< jstephens@mkblaw.com>

Respectfully Submitted,

DATED: August 29, 2011

By: /s/ Bryan W. Pease  
BRYAN W. PEASE  
Attorney for Plaintiff Susan Shalov